



U. S. Department of Justice

*United States Attorney
Northern District of New York*

304 Federal Building
15 Henry Street
Binghamton, New York 13901-2753

607 / 773-2887
FAX: 607 / 773-2901

January 17, 2006

Honorable Thomas J. McAvoy
Senior Judge, U.S. District Court NDNY
Federal Building
15 Henry Street
Binghamton, New York 13901

Re: United States v. David Falso, [05-CR-270 (TJM)]

Dear Judge McAvoy:

This letter request respectfully seeks permission for the government to file an over the page limit Omnibus Motion Response to defendant Falso's extensive and voluminous omnibus motions. Our Omnibus Motion Response is 34 pages long. It was simply impossible to cover all the issues and grounds raised by defendant Falso in a shorter response.

Thank you for your consideration in this matter.

Very truly yours,

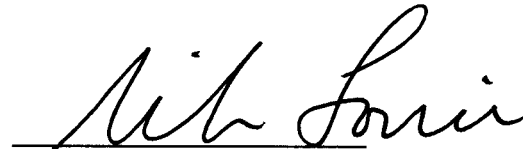
GLENN T. SUDDABY
United States Attorney

A handwritten signature in black ink, appearing to read "M. Lovric", is written over the typed name of the Assistant U.S. Attorney.

BY: Miroslav Lovric
Assistant U.S. Attorney

CERTIFICATE OF SERVICE FOR ELECTRONIC CASE FILING SYSTEM

I hereby certify that on January 17, 2006, I electronically filed with the NDNY Clerk of the District Court using the CM/ECF system the above-referenced document(s) in connection with the above-referenced case. The CM/ECF system automatically sent electronic notifications of such filing to the attorneys of record in this case, as maintained by the District Court Clerk's Office, AND who are properly registered in the CM/ECF system for the NDNY as required pursuant to NDNY General Order #22. As for any attorney of record in this case who is not registered in the CM/ECF system for the NDNY, the government has caused to be mailed or faxed to that attorney either the actual CM/ECF electronic notification/e-mail as received from the CM/ECF system by the government and/or the actual documents being filed. Therefore, the non-registered attorney(s) will receive the same electronic ECF notice with the same information as will the attorney(s) who is/are registered in the CM/ECF system.

A handwritten signature in black ink, appearing to read "M. Lovric", is written over a horizontal line.

Miroslav Lovric
Assistant U.S. Attorney